

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

INDICTMENT FOR THEFT OF PUBLIC MONEY
AND FALSE STATEMENTS

UNITED STATES OF AMERICA	*	CRIMINAL DOCKET NO.	
v.	*	SECTION:	
SUZAN BACIGALUPI	*	VIOLATIONS:	18 U.S.C. § 641 18 U.S.C. § 1001
	*	*	*

The Grand Jury charges:

COUNT ONE

On or about October 6, 2005, in the Eastern District of Louisiana and elsewhere, in a matter within the jurisdiction of the United States Department of the Interior, an agency or department of the United States of America, the defendant, **SUZAN BACIGALUPI**, knowingly and willfully used a false writing or document, more specifically, a Travel Voucher numbered TV-6-00026 with an attached grant receipt from the Kirkland Ranch, knowing that this document or writing contained a materially false, fictitious and fraudulent statement or entry, that is, said Travel Voucher numbered TV-6-00026 with the attached guest receipt from the Kirkland Ranch showed that the defendant paid \$1700.00 to stay at the Kirkland Ranch from September 13, 2005 through September 30, 2005, when in truth and in fact and as the defendant well knew, the defendant created the false guest

receipt and did not pay \$1700.00 to stay at the Kirkland Ranch as stated on her travel voucher; all in violation of Title 18, United States Code, Section 1001.

COUNT TWO

On or about October 21, 2005, in the Eastern District of Louisiana and elsewhere, in a matter within the jurisdiction of the United States Department of the Interior, an agency of the United States of America, the defendant, **SUZAN BACIGALUPI**, knowingly and willfully used a false writing or document, more specifically, a Travel Voucher numbered TV-6-00226 with an attached grant receipt from the Kirkland Ranch, knowing that this document or writing contained a materially false, fictitious and fraudulent statement or entry, that is, said Travel Voucher numbered TV-6-00226 with the attached guest receipt from the Kirkland Ranch showed that the defendant paid \$1260.00 to stay at the Kirkland Ranch from October 1, 2005 through October 14, 2005, when in truth and in fact and as the defendant well knew, the defendant created the false guest receipt and did not pay \$1260.00 to stay at the Kirkland Ranch as stated on her travel voucher; all in violation of Title 18, United States Code, Section 1001.

COUNT THREE

From on or about October 6, 2005 to October 13, 2005, in the Eastern District of Louisiana and elsewhere, the defendant, **SUZAN BACIGALUPI**, did steal, purloin and knowingly convert to her own use funds in excess of \$1,000 belonging to the United States of America, that is approximately \$1700.00, by receiving travel and other reimbursements from the United States Department of the Interior, to which she knew she was not entitled; all in violation of Title 18, United States Code, Section 641.

COUNT FOUR

From on or about October 21, 2005 to October 26, 2005, in the Eastern District of Louisiana and elsewhere, the defendant, **SUZAN BACIGALUPI**, did steal, purloin and knowingly convert to her own use funds in excess of \$1,000 belonging to the United States of America, that is approximately \$1260.00, by receiving travel and other reimbursements from the United States Department of the Interior, to which she knew she was not entitled; all in violation of Title 18, United States Code, Section 641.

A TRUE BILL

FOREPERSON

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New Orleans, Louisiana